

REMARKS

In response to the Office Action dated February 24, 2005, Applicants respectfully requests reconsideration based on the above claim amendments and the following remarks. Applicant respectfully submits that the claims as presented are in condition for allowance.

Upon entry of the present Amendment, claims 1-22 and 25-31 will remain pending. Claims 1, 3, 5-13, 15-17 and 20-22 and 25-31 will have been amended. Claims 23 and 24 will have been canceled.

Applicants wish to express their appreciation to the Examiner and the Examiner's supervisor for their consideration and time during the telephonic interview conducted by Applicants representative on April 20, 2005. During the interview, Applicants' representative discussed the operation of the present invention with reference to the claims and contrasted that with teaching of Feit et al. No agreement was reached with regard to the claims.

Turning to the Office Action of February 24, 2005, the Examiner objected to the disclosure and asserted that the phrase "because they require information the user does not have to make a request" is unclear (page 1, paragraph 4, lines 4-5). Applicants have amended paragraph [0004] of the specification to more clearly point out one of the limitations of the prior art that the instant invention advantageously overcomes. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the objection to the specification.

The Examiner objected to claims 13, 25 and 27 because of various informalities and required correction. The Examiner provided suggested corrections, which have been incorporated into claims 25 and 27 by Applicants. Applicants wish to note that certain amendments to claims 13 and 16 were intended to be part of the Preliminary Amendment of December 2, 2004. However, it appears that at least claim 13 was not entered as intended due to Applicants' use of a single bracket to mark the deleted text ("[and]"). To clarify the record, Applicants have reintroduced the amendment to claim 13 (and claim 16 for the same reason) that was intended to be in the Preliminary Amendment. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the objection to claims 13, 25 and 27.

The Examiner rejected claim 11 under 35 U.S.C. § 112, second paragraph, as being indefinite. The Examiner noted that the limitation "said subscription center" lacked a

sufficient antecedent basis. In this regard, Applicants have amended claim 11 to recite "said subscriber database." Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection under 35 U.S.C. § 112, second paragraph.

The Examiner rejected claims 1, 2, 11, 12 and 17 under 35 U.S.C. § 102(e) as being anticipated by Feit et al. (U.S. Publication No. 2001/0056354). The Examiner asserted that Feit et al. substantially teach the subject matter of claims 1, 2, 11, 12 and 17. Applicants respectfully traverse and submit that Feit et al. do not teach or suggest the subject matter of claims 1, 2, 11, 12 and 17, as amended herein.

The present invention, as recited in all claims, is directed to *inter alia.*, a *stateless* module manager (see paragraph [0026] for support for this amendment). As such, the module manager receives and routes requests without any prior knowledge of the client sending the request, or without any knowledge of where the request will be sent until it is actually received. Because the module manager is stateless, the distributed information system (claims 1, 2 and 11) and the methods therein (claims 12 and 17), treat each request as an independent transaction, unrelated to any previous request.

To the contrary, and as discussed during the Interview of April 20, 2005, Fiet et al. teach a server system 14 (asserted by the Examiner in the Office Action to be a module manager) that requires state information to create the single user interface (transmitted by the web server 80 to the client 12) from which data is communicated to the service providers 18. In particular, a first interface details a multiplicity of services from which the client is asked to select services they wish to receive (see, paragraphs [0052] and [0059]-[0099]). Next, the server system 14 aggregates and populates another user interface with all of the qualification requirement information from each of the individual service providers 18's *from which services are desired* (see, paragraphs [0052] and [0100]-[0162]). Thus, this interface depends on the selections made in the first interface. The client makes a request by submitting the qualification requirement information for analysis by the desired service providers (paragraph [0052] and [0163]-[0184]). As such, the server system 14 taught by Feit et al. uses state information to process client requests. Accordingly, Feit et al. fails to teach or render obvious the stateless module manager of the instant invention.

Thus, in view of the above, the Examiner is respectfully requested to reconsider and withdraw the rejection of claims 1, 2, 11, 12 and 17 under 35 U.S.C. § 102(e).

The Examiner rejected claims 3, 5, 6, 15, 16, 20, and 21 under 35 U.S.C. § 103(a) as being unpatentable over Feit in view of Rubert et al. (U.S. Patent No. 6,366,915). The Examiner asserted that combination Feit et al. and Rubert et al. teach the subject matter of claims 3, 5, 6, 15, 16, 20, and 21. Applicants respectfully traverse.

To establish a prima facie case of obviousness, MPEP §2142 requires there must first be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art references when combined must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure.

As noted above, the present invention, as recited in the claims, is directed to distributed information systems and methods therein that include a stateless module manager. Fiet et al. fail to teach or suggest such a module manager. The secondary reference, Rubert et al. fails to remedy this deficiency. Therefore, the combination fails to teach at least this feature of the invention. Further, claims 3, 5, 6, 15, 16, 20, and 21 also recite additional features and limitations in combination with their respective base claims. As such, the combination of Fiet et al. and Rubert et al. fails to teach all of the limitations in claims 3, 5, 6, 15, 16, 20, and 21. For at least these reasons the combination does not establish a prima facie case of obviousness. Finally, claims 3, 5, 6, 15, 16, 20, and 21 respectively depend from what Applicants believe are allowable base independent claims. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of claims 3, 5, 6, 15, 16, 20, and 21 under 35 U.S.C. § 103(a).

The Examiner rejected claim 7 under 35 U.S.C. 103(a) as being unpatentable over Feit in view of Rubert and in further view of Hunt (U.S. Publication No. 2002/0087657). The Examiner asserted that combination Feit et al., Rubert et al. and Hunt teach the subject matter of claim 7. Applicants respectfully traverse.

Applicants submit that claim 7 is patentable over the Examiner's proposed combination for at least the reasons noted above as Hunt fails to remedy the deficiencies of Feit et al. and Rubert et al. Further, claim 7 depends from what Applicants believe is an

allowable base independent claim. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of claim 7 under 35 U.S.C. § 103(a).

The Examiner rejected claims 8, 9, and 10 under 35 U.S.C. 103(a) as being unpatentable over Feit in view of Strahm et al. (U.S. Publication No. 2003/0046337) in further view of Langseth et al. (U.S. Patent No. 6,741,980). Applicants respectfully traverse. Applicants believe that these claims are allowable for the reasons noted above as the proposed combination of references does not teach all of the limitations of these claims. In addition, claims 8, 9 and 10 depend from what Applicants believe is an allowable base independent claim. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of claims 8, 9 and 10 under 35 U.S.C. § 103(a).

The Examiner rejected claims 13, 18, 22, 23, 24, 30 and 31 rejected under 35 U.S.C. 103(a) as being unpatentable over Feit in view of Rubert and in further view of Strahm. The Examiner asserted that combination Feit et al., Rubert et al. and Strahm teach the subject matter of claims 13, 18, 22, 23, 24, 30 and 31. Applicants respectfully traverse.

With regard to claim 22, Applicants noted above with regard to the rejection under 35 U.S.C. § 102(e) that Feit et al. fails to teach a stateless module manager as its server 14. Further, Rubert et al. and Strahm fail to remedy the deficiencies of Feit et al, therefore, the proposed combination fails to yield Applicants' invention as recited in claim 22. As the Examiner's proposed combination fails to teach each and every limitation in claim 22, Applicants submit that claim 22 is allowable over the proposed combination of references.

With regard to claims 13, 18, 23, 24, 30 and 31, Applicants believe that these claims are also allowable for the reasons noted above, as the proposed combination of references fails to yield the Applicants' invention as recited in these claims. In addition, claims 13, 18, 22, 23, 24, 30 and 31 respectfully depend from what Applicants believe are allowable base independent claims. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of claims 13, 18, 22, 23, 24, 30 and 31 under 35 U.S.C. § 103(a).

The Examiner rejected claims 4, 14 and 19 under 35 U.S.C. 103(a) as being unpatentable over Feit in view of Hunt, and in further view of Bavadekar (U.S. Publication No. 2003/0009571). Applicants respectfully traverse. Applicants believe that these claims are also allowable for the reasons noted above, as the proposed combination of fails to yield the Applicants' invention as recited in these claims. In addition, claims 4, 14 and 19

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respectfully depend from what Applicants believe are allowable base independent claims. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of claims 4, 14 and 19 under 35 U.S.C. § 103(a).

The Examiner rejected claims 28 and 29 under 35 U.S.C. 103(a) as being unpatentable over Feit, Rubert, and Strahm in further view of Hunt and Bavadekar. Applicants respectfully traverse. Applicants believe that these claims are also allowable for the reasons noted above, as the proposed combination of fails to yield the Applicants' invention as recited in these claims. In addition, claims 28 and 29 respectfully depend from what Applicants believe is an allowable base independent claim. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of claims 28 and 19 under 35 U.S.C. § 103(a).

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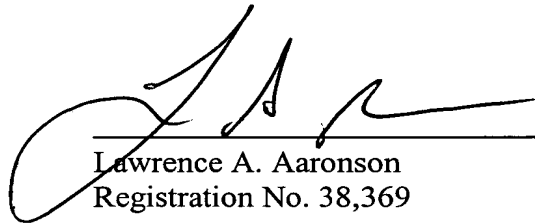
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CONCLUSION

It is respectfully submitted that each and every claim pending in this application patentably defines over the prior art of record. For all the foregoing reasons, Applicant respectfully submits that the instant application is in condition for allowance.

Reconsideration of the present Office Action and an early Notice of Allowance are respectfully requested.

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